

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

EDMUND MURPHY III, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

JBS S.A.,

Defendant.

Case No.: 1:17-cv-03084-ILG-RER

Hon. Judge I. Leo Glasser

Hon. Magistrate Judge Ramon E. Reyes, Jr.

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR: (I) AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT
OF LITIGATION EXPENSES; AND (II)
INCENTIVE AWARDS TO PLAINTIFFS**

**TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR COUNSEL OF
RECORD:**

PLEASE TAKE NOTICE that, pursuant to the Court's March 8, 2019 Order Preliminarily Approving Proposed Settlement (Dkt. No. 42) (the "Preliminary Approval Order"), on July 18, 2019, at 11:00 a.m. in Courtroom 8B South at the United States District Court for the Eastern District of New York, 225 Cadman Plaza, Brooklyn, NY 11201, the Honorable I. Leo Glasser, presiding, Lead Plaintiff GWI Enterprises Ltd. ("Plaintiff"), by and through its counsel, Levi & Korsinsky, LLP, will and hereby do move for: (i) an award of attorneys' fees and reimbursement of litigation expenses; and (ii) an incentive award for Plaintiff.

This motion is based upon the Memorandum of Law in Support of Plaintiff's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; the Declarations of Adam M. Apton (Dkt. Nos. 40, 46), Steven Straub (Dkt. No. 47), Rafael Mathias Sugai (Dkt. No. 48), and Hon. Faith S. Hochberg (Ret.) (Dkt. No. 49); the record and proceedings in this Action; and such matters as the Court may consider at the time of the hearing.

Plaintiff submits a proposed approval order in connection with this motion. The proposed approval order is the same proposed approval order submitted in connection with Plaintiff's Motion for Final Approval (Dkt. No. 44-2). Paragraphs 22 and 23 grant the relief requested herein.

DATED: May 16, 2019

Respectfully submitted,

By: /s/ Adam Apton

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